



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8960

December 1, 2008

Daniel R. Brown, Superintendent  
Chattahoochee River National Recreation Area  
1978 Island Ford Parkway  
Atlanta, GA 30350-3400

**SUBJECT:** Supplemental Draft General Management Plan/Environmental Impact Statement  
for the Chattahoochee River National Recreation Area in Atlanta, Georgia; CEQ  
Number 20080364

Dear Mr. Brown:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Supplemental Draft General Management Plan/Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The purpose of this general management plan and Supplemental Draft EIS is to present a plan for managing the Chattahoochee River National Recreation Area (CRNRA) in Atlanta, Georgia, for the next 15 to 20 years. The National Park Service (NPS) is the lead federal agency for the proposed action.

General management plans represent the broadest level of planning conducted by the NPS and are intended to provide overall guidance for making informed decisions about future conditions in national parks. The NPS released a Draft EIS in 2004 that assessed the potential environmental impacts of four alternatives (A, B, C, and D) for managing the CRNRA. Based upon feedback received regarding these alternatives, additional meetings were conducted and two new alternatives (E and F) were developed and analyzed. The Supplemental Draft EIS assesses the environmental impacts of these two new alternatives in terms of levels of service for visitor interpretation and education in the CRNRA, suitable locations for administration and visitor facilities, and management of the CRNRA to allow for preservation of natural and cultural resources. Alternative F is identified as the preferred alternative and would provide more opportunities for access to the Chattahoochee River, facilities development, and an increased diversity of experience, as compared to the other alternatives.

EPA appreciates that the NPS developed a Supplemental Draft EIS and new alternatives to respond to public criticism of the original Draft EIS. The new alternatives represent combinations of the existing alternatives along with new zone types and management prescriptions. Alternative F provides opportunities for the NPS to expand use to local visitors and increase connectivity to neighboring communities through trail linkages, partnering, and expanded interpretive, education and outreach activities. Alternative F would also have a greater relative amount of land disturbing activity, as compared to the other alternatives, due to an increase in "hardened" types of access (e.g., boat ramps, parking areas, and paved trails) and

development of support facilities.

A number of mitigation measures are proposed in the Supplemental Draft EIS to avoid or minimize potentially adverse impacts from implementation of the new management plan and to ensure that the park's natural and cultural resources are protected and preserved for future visitors. EPA supports inclusion of these mitigation measures as part of the new general management plan for CRNRA, particularly the commitment to develop a resource stewardship strategy, fisheries management plan, and instream flow studies. EPA recommends that these programs include significant monitoring activities to ensure that the increase in hardened access areas and likely subsequent increase in recreational and educational usage of the park do not negatively impact natural and cultural resources.

In addition, EPA recommends inclusion of two specific outreach items related to water quality in the resource stewardship strategy: 1) the bacteria monitoring program, BacteriALERT, that was described in the Supplemental Draft EIS; and 2) publication and awareness of the various fish consumption advisories that currently exist throughout the CRNRA. It is unclear from the Supplemental Draft EIS if the BacteriALERT program will be continued under the new management plan. Both of these programs represent additional partnership opportunities with public and private organizations, such as the Georgia Environmental Protection Division, Georgia Conservancy, and Upper Chattahoochee Riverkeeper, and could be included in an overall water quality improvement and educational awareness strategy. In particular, these items will be especially important as new facilities are developed or in areas that are currently not meeting their designated uses (e.g., below Morgan Falls dam).

We rate this document LO (Lack of Objections). EPA lacks objections to the proposed project and believes that the Supplemental Draft EIS provided adequate information on the environmental impacts. All mitigation measures and monitoring programs, as described in the Supplemental Draft EIS and including the above recommendations, should be fully implemented. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a stylized, flowing script.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management